

October 27, 2011

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of Ex Parte Presentation

Permitted Under 47 C.F.R. § 1.1203(a)(1) (exempt under 47 C.F.R. § 1.1204(a)(10))

**WC Docket No. 10-90; GN Docket No. 09-51; WC Docket No. 07-135;
WC Docket No. 05-337; CC Docket No. 01-92; CC Docket No. 96-45;
WC Docket No. 03-109**

Dear Ms. Dortch:

On October 26, 2011, on behalf of Cablevision Systems Corp. (“Cablevision”), the undersigned responded by telephone to a question from Angela Kronenberg, Wireline Legal Advisor to Commissioner Clyburn, regarding the practical value of a statement by the Commission that carriers had an obligation to engage in “good faith” negotiations in response to requests for IP-to-IP interconnection. I told Ms. Kronenberg that while such a statement might be useful in interconnection negotiations and arbitrations, it fell far short of a declaratory ruling that ILECs were required under section 251(c)(2) to provide such interconnection because a carrier would likely argue that its refusal to provide IP-to-IP interconnection was justified by technical or cost considerations. I pointed out the record evidence of the ILECs’ persistent refusal to provide IP-to-IP interconnection, as collected in the attachment to Cablevision’s October 20, 2011 ex parte filing in the above-captioned dockets. Finally, I noted that any such statement should make clear that ILECs bear the costs of converting traffic from TDM to IP in any IP-to-IP interconnection arrangements.^{1/} Allowing ILECs to offload their costs of conversion onto the VoIP provider would largely negate the benefits of any statement or ruling intended to encourage IP-to-IP interconnection.

The undersigned inadvertently failed to file this notice prior to the end of the day yesterday, but notes that the ex parte presentation addressed matters already covered in Cablevision’s filings in this proceeding and that the opportunity to respond to a Sunshine Period ex parte presentation contemplated by same day filing requirement was made moot by the fact that the Commission acted on the day immediately following the presentation.

^{1/} See *Connect America Fund, et al.*, WC Docket No. 10-90, Comments of Cablevision Systems Corporation (filed April 18, 2011), at 7-8.

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.

Ms. Marlene H. Dortch

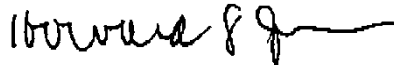
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Pursuant to section 1.1206(b) of the Commission's rules, an electronic copy of this letter is being filed electronically with the Office of the Secretary and served electronically on Ms. Kronenberg.

Should there be any questions regarding these matters, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Howard J. Symons", with a long horizontal flourish extending to the right.

Howard J. Symons

cc: Angela Kronenberg